

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES

v.

JEROME LASSITER

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) **No. 04-10114-DPW**
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DEFENDANT'S MOTION TO MODIFY CONDITIONS OF DETENTION

The defendant, Jerome Lassiter, hereby moves this Court to modify the conditions of his detention and allow him to be temporarily released to the authorities at Spectrum House, 150 Oak Street, Westborough, Massachusetts, in order to participate in the facility's substance abuse treatment program. As reasons herein, the defendant states that his substance abuse problems cannot be successfully rehabilitated without professional, in-patient treatment.

The defendant is currently housed at the Plymouth County Correctional Facility, where he has been told his status as a federal detainee prevents him from receiving certain health care services including, but not limited to, a medical evaluation of his substance abuse dependency level. Even if he did receive an evaluation, the facility is unequipped and unable to provide him with the kind of continual expert care he needs to permanently end his substance abuse problems.

If this motion is granted, the defendant will participate fully in the Spectrum House program and obey all of its rules and regulations. He further agrees: to sign all papers necessary to advise Pre-Trial Services of his progress; to sign all papers necessary to allow Pre-Trial Services and Spectrum House to obtain all records of prior substance abuse treatment; to notify Pre-Trial Services at least 48 hours prior to any anticipated release from Spectrum House, and;

that he will not leave Spectrum House under any circumstances without permission.

After completing the program, the Spectrum House authorities could return the defendant to the District Court for further proceedings in the above-named case. The defendant states that the conditions set forth above will ensure his appearance at any and all future courts dates in his case, and will protect the safety of any and all persons and the community.

JEROME LASSITER

By his attorney,

/s/ John H. Cunha Jr.

John H. Cunha Jr.

B.B.O. No. 108580

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Dated: November 11, 2004

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